

**UNIVERSITY OF HOUSTON SYSTEM
ADMINISTRATIVE MEMORANDUM**

SECTION: General Administration

NUMBER: 01.D.17

AREA: Legal Affairs

SUBJECT: Export Controls

1. PURPOSE

The purpose of this policy is to reinforce compliance with U.S. export controls, to heighten awareness and understanding of export control laws and regulations and their application in a university setting, and to set forth expectations regarding compliance. Failure to comply with Export Controls can result in significant institutional sanctions and penalties. Violating Export Controls may also result in individual criminal sanctions.

2. SCOPE AND APPLICABILITY

U.S. export control and sanctions laws and regulations, including, but not limited to, the International Traffic in Arms Regulations (ITAR), the Export Administration Regulations (EAR), and the Office of Foreign Assets Control's Sanctions Regulations, restrict certain types of information, technologies and commodities that can be transmitted overseas to entities and individuals, including U.S. citizens, or made available to foreign nationals on U.S. soil. These laws are designed to protect U.S. national security and economic interests, and further U.S. foreign policy goals and they govern the transmission of "controlled" information, technology and items.

3. POLICY

3.1. The University is committed to complying with applicable export control laws and regulations.

3.2. Before engaging in activities potentially subject to export control laws, UH faculty, staff and students must recognize the potential implications of such activity and comply with any requirements and limitations. Export control laws are regulations restricted to two principal areas of activity: (1) the shipment, transmission, or transfer of commodities, software, technology, technical data, services, and information shared orally, visually, electronically or written to anyone outside the U.S.; and (2) the disclosure of controlled technology or software to foreign nationals located in the U.S., including discussions with researchers or students, known as a "deemed export".

3.3. It is the responsibility of faculty, staff and students to be aware of and comply with U.S. export control laws and regulations, as well as university policies and

protocols, before engaging in any activities that may raise compliance issues under U.S. export control laws and regulations. Each university will designate an individual or office to provide guidance to faculty, staff and students in assessing the applicability of export control regulations; however, primary responsibility for compliance rests with the individual faculty, staff or student.

4. REVIEW AND RESPONSIBILITY

Responsible Parties: Assistant Vice President for Sponsored Research Administration

Vice Chancellor for Legal Affairs and General Counsel

Review: Every five years

5. APPROVAL

Approved: /Paula Myrick Short/
Senior Vice Chancellor for Academic Affairs

/Raymond Bartlett/
Senior Vice Chancellor for Administration and Finance

/Amr Elnashai/
Vice Chancellor for Research and Technology Transfer

/Dona Cornell/
Vice Chancellor for Legal Affairs and General Counsel

/Renu Khator/
Chancellor

August 31, 2022
Date

6. REFERENCES

- [University of Houston Export Controls webpage](#)
- [University of Houston Clear Lake Export Controls webpage](#)
- [International Traffic in Arms Regulations \(ITAR\) 22 C.F.R. §§ 120-130](#)
- [Export Administration Regulations \(EAR\) 15 C.F.R. §§ 730-774](#)
- [Office of Foreign Assets Control \(OFAC\) 31 C.F.R. §§ 500-599](#)
- [Atomic Energy Act of 1954 42 U.S.C. Section 2011, et seq.](#)
- [Nuclear Regulatory Commission Regulations, 10 C.F.R. Part 110](#)
- [List of Specially Designated Nationals and Blocked Persons \(SDN List\)](#)
- [Restricted Parties Screening Lists](#)